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Mr. Samuel Borries
On-Scene Coordinator
U.S. Environmental Protection Agency
Region 5, Emergency Response Branch
77 West Jackson Boulevard
Chicago, IL 60604-3507

February 15, 2011

TDD No.: S05-0002-0909-022
DCN: 819-2B-ALRP
Work Order No.: 20405.012.002.0819.00

Re: Review comments on the Final Construction Completion Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site/Plainwell No. 2 Dam Area Time-Critical Removal Action submitted to the U.S. Environmental Protection Agency by Arcadis.

Dear Mr. Borries,

Weston Solutions, Inc. (WESTON) is pleased to submit its review comments on the Final Construction Completion Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site/Plainwell No. 2 Dam Area Time-Critical Removal Action submitted to the U.S. Environmental Protection Agency by Arcadis. The review comments are provided below.

1. **Pages 2-1 through 2-2, Section 2.1, Paragraph 6**

   This paragraph states that "corrective actions to resolve problems or deficiencies were implemented by subcontractors and observed and documented by the CQA Observer."

   A sub-section of Section 2.1 should be included in the report that provides detailed information on the problems and deficiencies encountered by Arcadis during the TCRA and the corrective actions that Arcadis implemented to correct these problems and deficiencies.

2. **Page 3-1, Section 3.2.1**

   This section states that a survey, conducted under USFWS oversight, and led by Dr. Allen Kurta, of Eastern Michigan University, identified eleven trees where the Indiana bat might roost, and that these trees were removed on March 30, 2009, at the direction of USFWS.

   This section should explain, in greater detail, why the removal of the eleven trees was deemed necessary and why the removal did not constitute the potential destruction of the habitat of an endangered species, given that these trees, if left in place, could have provided habitat to the Indiana bat as a potential rooting site.

3. **Page 3-2, Section 3.2.4, Paragraph 2**

   This paragraph states that the analytical results for the borrow material samples are summarized in Table 1 and that the laboratory analytical data are included in Appendix C-1.

   However, the analytical data for the borrow material are actually located in Appendix C-2. As such, this paragraph needs to be revised to state that the borrow material results are located in Appendix C-2.

4. **Pages 3-3 through 3-4, Section 3.2.5.1, Paragraph 5**

   This paragraph states that the analytical results for the pre- and post-construction samples are summarized in Table 2 and that the laboratory analytical data are included in Appendix C-2.

   However, the analytical data for the pre- and post-construction samples are actually located in Appendix C-1. As such, this paragraph needs to be revised to state that the pre- and post-construction results are located in Appendix C-1.

5. **Page 3-15 through 3-16, Section 3.4.2.2, Paragraph 3**

   This paragraph states that after excavation, Arcadis collected sub-samples from random locations within each of the six cells that constituted the grids within each area.

   This paragraph could potentially lead a reader to believe that each point was entirely random, and that no pre-determination took place that resulted in the sample point being chosen within the cell over any other point in the cell. However, Arcadis did use a point-generation program to determine where Arcadis would collect each sample within each cell.

   As such, this paragraph should be revised to include a brief narrative concerning the point-generation program so that a reader can understand how Arcadis chose the points from which its personnel collected sample material within each cell.

6. **Page 3-19, Section 3.4.3.7, Paragraph 1**

   This paragraph states that the downstream two-thirds of Island 1 were removed to river bottom. This is not the case given that the downstream two-thirds of Island 1 were only removed to a point approximately nine to twelve inches above the river surface. Additionally, Arcadis collected two sediment samples from Island 1 (TS20282 and TS20283). This sample collection would not have occurred had Terra excavated this portion of Island 1 to the river bottom.

   As such, Arcadis should revise this paragraph to state that Terra excavated the downstream two-thirds of Island 1 to a point approximately nine to twelve inches above the river surface.

7. **Pages 3-21 through 3-23, Section 3.4.4.4, Paragraph 5**

   This paragraph states that the analytical results for Area 5B are located in Figure 6.4 and in Table 5. However, two of the samples collected from Area 5B (TS20441 and TS20477) are actually listed in the table provided in Figure 6.3. Another sample (TS20502) is not shown in either of these figures.

   As such, Arcadis should revise this paragraph to state that the sample results for Area 5B are located in both Figure 6.3 and Figure 6.4, and should add the pertinent information for Sample TS20502 to Figure 6.3.

8. **Pages 3-21 through 3-23, Section 3.4.4.4, Paragraph 9**

   This paragraph, Table 5, and Figure 6.3 all reference Sample TS20441. However, the total PCB analytical result shown for this sample, in Table 5, is incorrect given that this table indicates a total PCB result of 7.9 mg/kg. The correct total PCB result for this sample is 8.4 mg/kg. As such, Arcadis should correct Table 5 to reflect the correct total PCB result for this sample.

9. **Pages 3-21 through 3-23, Section 3.4.4.4, Paragraph 9**

   This paragraph, Table 5, and Figure 6.3 all reference Sample TS20447. However, the total PCB analytical result shown for this sample, in this paragraph and in Figure 6.3, is incorrect given that both indicate a total PCB result of 2.9 mg/kg. The correct total PCB result for this sample is 3.2 mg/kg. As such, Arcadis should correct this paragraph and Figure 6.3 to reflect the correct total PCB result for this sample.

10. **Pages 3-24 through 3-26, Section 3.4.4.6, Paragraph 6**

    This paragraph, Table 5, and Figure 6.7 all reference Sample TS20346. However, the total PCB analytical result shown for this sample, in this paragraph and in Figure 6.7, is incorrect given that both indicate a total PCB result of 16.0 mg/kg. The correct total PCB result for this sample is 17.2 mg/kg. As such, Arcadis should correct this paragraph and Figure 6.7 to reflect the correct total PCB result for this sample.

11. **Pages 3-26 through 3-30, Section 3.4.4.7, Paragraph 16**

    This paragraph, Table 5, and Figure 6.2 all reference Sample TS20453. However, the total PCB analytical result shown for this sample, in Table 5, is incorrect given that the table indicates a total PCB result of 1.8 mg/kg. The correct total PCB result for this sample is 1.6 mg/kg. As such, Arcadis should correct Table 5 to reflect the correct total PCB result for this sample.

12. **Pages 3-38 through 3-41, Section 3.7.3, Oxbow Area and Island 1 Sub-sections**

These two sub-sections should provide information concerning why restoration was not required in the Oxbow Area and on Island 1.

13. **Pages 3-42 through 3-43, Table 10**

Given that Table 10 is intended to provide a concise listing, and current status, of the access roads that Terra built during the TCRA, this table should also provide a brief statement as to why eight of the fourteen roads were left in place (e.g., left in place at owner's request, etc.).

14. **Page 3-45, Table 12**

Even though the last column of this table is entitled "Habitat Reconstruction/Revegetation Type," no information is listed regarding which of the three revegetation types (e.g., emergent wetland, floodplain forest, or upland forest) JFNew used in restoring the removal areas. As such, Arcadis should revise this column to include the revegetation type(s) used in each of the removal areas.

Arcadis should revise the sub-column heading of "Backfill" to read "Sand Backfill" so that the reader can understand that the backfill material is comprised of sand.

Arcadis should add a fourth sub-column entitled "Coir Logs" to the "Habitat Reconstruction/Revegetation Type" column, and mark, in this column, which removal areas received coir logs as a part of the reconstruction process.

The table also needs to be revised to properly show that Terra did not place sand backfill in Area 3B, and that Terra did use sand backfill, topsoil, river run rock, and coir logs in Area 6.

15. **Page 4-1, Section 4.1, Paragraph 3**

Arcadis should revise this paragraph to include the following information: (1) which federal and state agencies and companies will be responsible for monitoring the restored banks; and (2) who will be responsible for writing and reviewing the reports resulting from these monitoring activities.

16. **Table 1**

The analytical results for Sample TS10037 are not shown in this table, even though Arcadis included these results Arcadis in Appendix C-2.

Arcadis should revise this table to include the analytical results this sample.

17. **Table 4**

The analytical results for Samples TS30142, TS30164, and TS30186 are not shown in this table, even though Arcadis included these results in Appendix C-4.

Arcadis should revise this table to include the analytical results for these samples.

18. **Table 5**

Arcadis should make the following revisions to this table: (1) The numerical values for the total PCB values should be stated to the nearest tenth, not simply rounded up or down to the nearest whole number (e.g., the total PCB result shown for TS20346 is 17 mg/kg, while the sum total of the detected Aroclors is actually 17.2 mg/kg); (2) the Test America Laboratory (TAL) results shown for Samples TS20282, TS20291, TS20303, TS20309, TS20322, and TS20330 need to be deleted due to the fact that TAL did not, in fact, analyze these samples; and (3) the Aroclor-specific results for U.S. EPA Samples TS20282, TS20291, TS20303, TS20309, TS20322, and TS20330 need to be added to the appropriate rows for these samples so that the values of the Aroclor-specific results add up to the values shown for the total PCB results for these samples (the appropriate PDF results for these samples are attached to these comments).

19. **Table 9**

The analytical results for Sample W_SA1_DUP_006 are not shown in this table, even though Arcadis included these results in Appendix C-5.

Arcadis should revise this table to include the analytical results for this sample.

20. **Appendix C-3**

The analytical results for Samples TS20499, TS20500, and TS20501 are not shown in this appendix, even though Arcadis included these results in Table 5.

Arcadis should revise this appendix to include the analytical results for these samples.

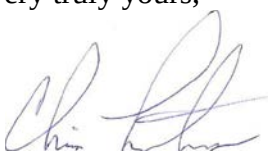
21. **Appendix C-5**

The analytical results for Sample W_SA1_DUP_004 are not shown in this appendix, even though Arcadis included these results in Table 9.

Arcadis should revise this appendix to include the analytical results for this sample.

Should you have any questions or require additional information on these comments, please feel free to contact us at Omprakash.Patel@WestonSolutions.com or mbrowning@dynamac.com.

Very truly yours,



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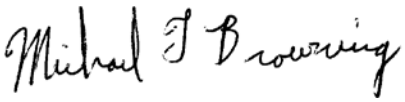

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